

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

SUSAN JOHNSON, individually and on
behalf of her minor son 'B.L.', and on behalf
of DERRICK THOMPSON, deceased,

Plaintiff

v.

CITY OF BIDDEFORD, BIDDEFORD
POLICE DEPARTMENT, a Municipal
Corporation organized and existing under
the laws of the State of Maine; MAINE
DEPARTMENT OF PUBLIC SAFETY, a
state agency organized under the laws of the
State of Maine; JOHN E. MORRIS,
individually and as the Commissioner of the
Maine Department of Public Safety;
ROGER BEAUPRE, individually and as
Chief of Biddeford Police Department;
EDWARD DEXTER, individually and as an
employee of the Biddeford Police
Department; JACOB WOLTERBEEK,
individually and as an employee of the
Biddeford Police Department and JANE
DOE,

Defendants

Civil Action No. 17-cv-00264-JDL

UNOPPOSED MOTION TO EXTEND PLAINTIFF'S DEADLINE TO FILE A REPLY BRIEF

Now come the Plaintiffs, by and through undersigned counsel, and move this Honorable Court to extend their deadline to file a reply brief to May 30th 2022. In support thereof, Plaintiffs further state:

1. Plaintiffs recently consented to an extension for time for defendants to file their motion for summary judgment. In that extension Plaintiffs' deadline to file a reply brief was extended to May 16, 2022.
2. Counsel contemporaneously has an appeal due to the Maine Supreme Judicial Court.

3. Defendants by and through attorney Joseph Padolsky DO NOT object to extending plaintiffs' deadline in the instant case to accommodate for Counsel's deadline in the appeal.
4. If the court extends the plaintiffs' deadline to May 30th, defendant's deadline to file a reply brief should be extended to June 9th, 2022 to remain consistent with the timeframes reflected in the original scheduling order.

WHEREFORE, the parties respectfully requests this Court enter an Order re-setting the summary judgment deadlines as follows:

	Current Deadline	New Deadline
Plaintiffs' Response Brief	5/16/2022	5/30/2022
Defendants' Reply Brief	5/26/2022	6/09/2022

Respectfully submitted,

Plaintiff,
Susan Johnson, individually and on behalf of
her minor son 'B.L.', and on behalf of Derrick
Thompson, deceased,

/s/ Kristine C. Hanly

Kristine C. Hanly, Esq.
Hanly Law
1 Union Street, Suite 401
Portland, ME 04101
(207) 699-2278
Kristine@hanlylaw.com

CERTIFICATE OF SERVICE

I certify that on this 16th day of May 2022 I caused a true copy of the enclosed motion to be served upon Joseph P. at the following:

Joseph A. Padolsky, Esq.

Louison, Costello, Condon & Pfaff, LLP
Ten Post Office Square, Suite 1330
Boston, Massachusetts, 02109
(617) 439-0305
jpadolsky@lccplaw.com

Respectfully submitted,

Plaintiff,
Susan Johnson, individually and on behalf of
her minor son 'B.L.', and on behalf of Derrick
Thompson, deceased,

/s/ Kristine C. Hanly

Kristine C. Hanly, Esq.
Hanly Law
1 Union Street, Suite 401
Portland, ME 04101
(207) 699-2278
Kristine@hanlylaw.com